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**United States District Court
Northern District of California**

DB2/ 24295508.1

Stipulation and [Proposed] Order Continuing Case Management Deadlines

Case No: 5:12-cv-03787 HRL - 1

STIPULATION TO CONTINUE CASE MANAGEMENT DEADLINES

Pursuant to Local Rules 6-2 and 7-12 the parties, by and through their undersigned counsel, hereby stipulate to entry of an order continuing the fact discovery deadline in this matter from August 13, 2013 until September 30, 2013 for the purpose of allowing the parties to complete depositions currently noticed by the Parties, and the deadline for hearing on motions for summary judgment from October 8, 2013 until December 3, 2013. All other deadlines are to be extended correspondingly. The grounds for seeking this continuance are set out in the Declaration of Counsel filed herewith. The limitation on the scope of discovery during the extension is a limitation placed on the stipulation by Defendant. Plaintiff does not agree that the extended discovery should be limited in any way and reserves all rights in this regard. Specifically, the parties stipulate as follows:

12 The fact discovery cutoff in this matter shall be continued until September 30, 2013 for
13 the purpose of allowing the parties to complete depositions currently noticed by the
14 Parties; and

15 The deadline for hearing on motions for summary judgment other than the currently
16 pending motion shall be continued until December 3, 2013; and

17 All other case management deadlines after August 1, 2013 including expert discovery
18 and the pretrial conference shall be continued correspondingly.

There have been no previous continuances of any deadline set by the Case Management Order in this matter.

22 | Dated this 12th day of August 2013

/s/

/s/
Karen E. Ford Esq.
Attorney for Plaintiff
Peter Siegel

1
2
3 **[PROPOSED] ORDER**
4

5 PURSUANT TO STIPULATION, IT IS SO ORDERED,
6

7 The deadlines set out in the case management order in this case are hereby continued as follows:
8

9 Fact Discovery Cutoff: _____ for the purpose of allowing the parties
10 to complete depositions currently noticed by the Parties and other discovery already
11 served , without prejudice to Plaintiff's right to argue that Plaintiff should be
12 allowed to conduct additional discovery.
13

14 Designation of Experts with Reports: _____
15

16 Designation of Rebuttal Experts with Reports_____
17

18 Expert Discovery Cutoff _____
19

20 Last Day for Hearings on Dispositive Motions other than the currently pending
21 motion _____ at 10:00 a.m.
22

23 Final Pretrial Conference _____
24

25 Dated: _____
26

27 **HOWARD R. LLOYD**
28 United States Magistrate Judge